

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:14-00275

FREEDOM INDUSTRIES, INC.

UNITED STATES MOTION FOR LEAVE TO FILE
EXTENDED SENTENCING MEMORANDUM

Comes now the United States of America by Philip H. Wright, Assistant United States Attorney for the Southern District of West Virginia, and respectfully requests the Court for leave to file a sentencing memorandum greater than the five pages allowed by the Court in its order dated March 24, 2015. The United States intends to more fully explain certain aspects of the case. The United States therefore requests leave of Court to file a sentencing memorandum of no greater than ten pages, with some exhibits.

Defense counsel for Freedom has authorized the government to state that Freedom has no objections to this motion.

Respectfully submitted,

CAROL A. CASTO
Acting United States Attorney

By:

s/Philip H. Wright
PHILIP H. WRIGHT, AUSA
WV State Bar No. 7106
300 Virginia Street East, Room 4000
Charleston, WV 25301
Telephone: 304-345-2200
Fax: 304-347-5104
Email: philip.wright@usdoj.gov

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "United States Motion for Leave to File Extended Sentencing Memorandum" has been electronically filed and service has been made on opposing counsel by virtue of electronic mail this 27th day of January, 2016, to:

Robert R. Leight, Esq.
Pietragallo Gordon Alfano
Bosick & Raspanti, LLP
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
Telephone: 412-263-4394
Fax: 412-263-4222
Email: RRL@Pietragallo.com

s/Philip H. Wright
PHILIP H. WRIGHT
Assistant United States Attorney
WV State Bar No. 7106
300 Virginia Street East
Room 4000
Charleston, WV 25301
Telephone: 304-345-2200
Fax: 304-347-5104
Email: philip.wright@usdoj.gov